IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

MADELINE GUADARRAMA	CIVIL NO.:07-1468 (SEC)
Plaintiff	
v.	
MVM SECURITY SERVICES, INC.; FULANO DE TAL; COMPAÑÍAS X, Y, Z	
Defendants	

JOINT MOTION FOR VOLUNTARY DISMISSAL

TO THE HONORABLE COURT:

COME NOW the captioned parties, through the undersigned counsel, and respectfully state, allege and pray:

1.   The appearing parties have reached an agreement resolving plaintiff's claims in the case at bar.

2.   The appearing parties also agreed to keep all terms and conditions in relation to the agreement as confidential.

3.   Therefore, they jointly request the voluntary dismissal with prejudice of all the claims presented by Madeline Guadarrama against MVM, Inc., without the imposition of attorney's fees or costs to either party. The parties, however, move the Court to retain jurisdiction to supervise the execution of the considerations agreed upon by the parties.

WHEREFORE, in view of the foregoing, the parties respectfully request that the Honorable Court dismiss with prejudice all claims against defendant and enter judgment, without the imposition of attorney's fees or costs to either party.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of June, 2009.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with

the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all parties

by operation of the Court's electronic filing system.

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